

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE FACEBOOK, INC. IPO SECURITIES  
AND DERIVATIVE LITIGATION

MDL No. 12-2389 (RWS)

This document relates to the  
Consolidated Securities Action:

No. 12-cv-4081	No. 12-cv-4763
No. 12-cv-4099	No. 12-cv-4777
No. 12-cv-4131	No. 12-cv-5511
No. 12-cv-4150	No. 12-cv-7542
No. 12-cv-4157	No. 12-cv-7543
No. 12-cv-4184	No. 12-cv-7544
No. 12-cv-4194	No. 12-cv-7545
No. 12-cv-4215	No. 12-cv-7546
No. 12-cv-4252	No. 12-cv-7547
No. 12-cv-4291	No. 12-cv-7548
No. 12-cv-4312	No. 12-cv-7550
No. 12-cv-4332	No. 12-cv-7551
No. 12-cv-4360	No. 12-cv-7552
No. 12-cv-4362	No. 12-cv-7586
No. 12-cv-4551	No. 12-cv-7587
No. 12-cv-4648	

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT AND APPROVAL OF NOTICE TO THE CLASS**

TO: ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Declaration of Thomas A. Dubbs, including the Stipulation and Agreement of Settlement dated February 26, 2018 (the "Stipulation") attached as an exhibit thereto; and all other papers and proceedings herein, Lead Plaintiffs, Arkansas Teacher Retirement System and Fresno County Employees' Retirement Association, hereby move this Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed class

action Settlement; (ii) approving the form and manner of giving notice of the proposed Settlement to Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel's motion for an award of attorneys' fees and Litigation Expenses.<sup>1</sup>

Also filed herewith is the Parties' agreed-upon proposed Order Preliminarily Approving Settlement and Providing for Notice and its exhibits.

Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

DATED: February 26, 2018

Respectfully submitted,

**LABATON SUCHAROW LLP**

/s/ Thomas A. Dubbs

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 26, 2018, I caused the foregoing Notice of Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement and Approval of Notice to the Class to be served electronically on all ECF participants.

/s/ *Thomas A. Dubbs*  
Thomas A. Dubbs